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12 **UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA**

14 Jennifer Bradford,

15 Plaintiff,

v.

16 United States of America,

17 Defendant.

18 Case No. 2:20-cv-00754-JAD-EJY

19 **Stipulation to Stay Proceedings Pending
20 Settlement Negotiations**

21 The parties, through their respective counsel, hereby stipulate to stay the
22 proceedings in this matter.

23 Discovery is currently stayed (ECF No. 21) pending the Court's ruling on
24 Defendant's Motion to Dismiss (ECF No. 13). The parties are in settlement negotiations
25 and are optimistic that they can resolve this matter. The parties seek to avoid a ruling on
the Motion to Dismiss while they explore potential settlement.

26 This is the parties' first request to stay the proceedings in this matter, and the
27 stipulation is not sought for purposes of delay. Rather, the parties request a stay to permit
28 them to focus their time and resources on settlement discussions. After conferring, the
parties believe a stay of 60 days, or until April 25, 2021, should be sufficient.

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1 WHEREFORE, the parties respectfully request that the Court enter an order
2 granting this stipulation and staying the proceedings until **April 25, 2021**, and that the
3 Court set a Status Conference, at a time and date convenient to the Court, shortly after
4 expiration of the stay.

5 Dated this 24th day of February 2021.

6 SIMON LAW

7 s/ Benjamin J. Miller
8 DANIEL S. SIMON, ESQ.
9 BENJAMIN J. MILLER, ESQ.
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NICHOLAS A. TRUTANICH
United States Attorney

s/ Brian W. Irvin
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14 IT IS SO ORDERED:
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17 UNITED STATES MAGISTRATE JUDGE
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DATED: February 24, 2021